

July 24, 2003

Jay S. Ellenberger
U.S. Environmental Protection Agency (7506C)
Ariel Rios Building
1200 Pennsylvania Avenue, N. W
Washington, DC 20460

Dear Mr. Ellenberger:

On behalf of the members of the National Alliance of Independent Crop Consultants (NAICC), I would like to thank you for the opportunity to comment on the Agency's proposed letter of acceptance of the NAICC Certified Professional Crop Consultant – Researcher (CPCC-R) certification program, as well as the guidance to the state and tribal government pesticide lead agency. We respectfully request that EPA acknowledge the Certified Professional Crop Consultant-Researcher Program as an appropriate certification program for the WPS crop-advisor exemption.

The CPCC-R meets the minimum requirements for programs that recognize qualified crop consultants for the WPS Crop Advisor exemption.

These minimum requirements are outlined below:

- Pesticide safety training that conveys at least all of the information required by the WPS for a pesticide safety training program for handlers, as specified in 40 CFR § 170.230(c)(4)
- A written test for competency
- Experience requirement of six (6) years with bachelor's degree; five (5) years with a master's degree; four (4) years with a doctorate degree
- Thirty-six (36) CEUs are required each year and are to be reported at renewal time
- Renewal period of one year

Further our requirements include:

- B.S. or B.A. in Agriculture, Pest Management, or Biology
- Agree to adhere to the NAICC Code of Ethics
- Submission of five clients as references

We appreciate this opportunity to submit written comments.

Sincerely,

Ray Young
President
National Alliance of Independent Crop Consultants
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